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June 30, 2005

Regulatory Analysis and Development  
PPD, APHIS, Station 3C71  
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Riverdale, MD 20737-1238

RE: Docket No. 05-015-1

To Whom It May Concern:

The National Animal ID System (NAIS) is not just about electronic identification of animals. Tracking (traceback / traceforward) systems that investigate serious animal disease problems use numerous resources found in the (Animal ID Toolbox). The NAIS is being established for one reason. This purpose is best summarized with the following quote from page 5 of the Strategic Plan Document. "APHIS is focusing on animal identification for one reason: to establish the animal information foundation necessary to support animal disease monitoring, surveillance, control, and eradication programs." This animal information foundation could be referred to as the (Animal ID Toolbox). The NAIS goal (48 hour traceback) will be best accomplished using all tools available which certainly includes electronic ID, but they also include brand and brand enforcement systems, breed registration numbers, producer assigned numbers, producer records, sale barn receipts, health certificates and group ID numbers etc.

The term flexible is used frequently in these documents. One size does not fit all. Brand states will have an advantage at startup over non-brand states because they already have systems in place that aid in tracking animal movements. It is important to understand the strengths and weaknesses of brand and complement the weakness with additional tools. The NAIS must stay flexible and should not fix what isn't broken.

An application of flexibility with regard to commingling would be accepting brand as suitable ID in community pastures. Cooperative grazing situations often involve the same producers grazing the same lands year in and year out. In brand states nearly all cattle going in and out of these common pastures will be branded. Many of these herds are closed. Risk of exposure to serious disease is low. They can all be traced to premises of origin with brand. This scenario represents a common situation in western states that can be handled through a flexible approach using group ID and brand. To burden these producers with a requirement forcing the use of RFID and a reporting requirement is not needed.

Cattle producers living near state borders will often own or lease grazing lands that straddle state lines. A similar application of flexibility allowing brand or producer assigned numbers as suitable ID should also be acceptable under this scenario. In the past animal health officials have recognized multi-state operations and created practical solutions for them. The NAIS does not need to change the way the cattle industry conducts business. It needs to understand how the cattle industry conducts business and then design a system that addresses normal operating procedures.

Livestock transportation needs to be discussed as long as we are on the subject of designing systems that address normal cattle industry operating procedures. Developing systems that are truly functional in scanning cattle on and off livestock transports (trucks) and then reporting the premises to premises transfers will solve many problems associated with implementing the NAIS. Transportation is the common denominator in tracking systems. One reality associated with cattle commerce is cattle will be purchased, loaded and on the road before they are resold. Information on health and brand certificates may not reflect the true destination because the cattle may not have been sold when they were loaded at the sale barn. This is not an accusation suggesting cattle buyers mislead market veterinarians and brand inspectors with false information. This is a description of how business may sometimes be conducted and the NAIS needs to recognize cattle commerce scenarios such as the one just described and design systems that complement the scenario. Documenting premises and animal ID on and off trucks would address the NAIS concerns in the situation just described. Another reason to focus on trucks is the development of specific technology that captures the premises to premises transfer of animal ID only needs to focus on the load out area. This more controlled environment (not to say that it is ideal) may help foster a more rapid identification of technologies that work and don't work, especially at the speed of cattle commerce.

Page 13 of the strategic plan draft states "the integration of animal identification technology standards (electronic identification, retinal scan, DNA, etc.) will be determined by industry to ensure the most practical options are implemented, and that new ones can easily be incorporated into the NAIS." Low frequency RFID was being discussed as the technology of choice in the early 1990s. The NAIS Cattle Working Group is currently recommending RFID as the technology of choice. Low frequency RFID will be an acceptable technology if it is incorporated into systems that move at the speed of cattle commerce. It should not impede or slow normal processes or change the way the cattle industry does business. Adaptation of new technologies that are clearly superior should not be slowed by cumbersome lengthy bureaucratic processes. Nomenclature assuring unique identification of individual animals is the important component of ISO certification. Selecting (ISO certified) for trade purposes or to protect the vested interests of existing RFID tag companies is wrong. It is especially wrong if this policy impedes rapid implementation of superior technologies.

Three questions regarding costs need to be answered:

1. What will be the true costs for implementation and maintenance?
2. Which parties will benefit from the NAIS?
3. Which parties will assist in paying for the NAIS?

One component of the North Dakota cooperative agreement field trial, conducted by the NDSU Dickinson Research and Extension Center calculated direct and indirect costs such as cost of the tag, labor and depreciation on equipment. Their estimate was \$7.62 per head.

Larry Schnell, the owner and manager of Stockmen's Livestock Exchange, Dickinson, ND expressed an excellent idea regarding funding for animal ID. His idea allows some cost recuperation by the producer and passes costs up the chain ultimately to the consumer. The idea is as follows. Producers receive a sum (perhaps \$5.00) when they sell a tagged calf. The \$5.00 is paid by the buyer. The new owner is reimbursed when the animal is resold and this continues until the animal is harvested. The \$5.00 will flow up the chain and be incorporated into the cost of the carcass. This would be approximately .7cents per pound on a 700 pound carcass. This plan or modifications of the plan would spread costs more equitably amongst beef producers, feeders, packers, retailers and consumers. The greatest resistance and most restricting bottleneck for implementation of the NAIS will most likely be the producer. This idea could stimulate participation and mitigate resistance amongst producers.

Regards,

James C. Clement, DVM  
ND Animal ID Coordinator, State Board of Animal Health